

REMARKS/ARGUMENTS

1. The Applicant has carefully considered the official communication dated May 10, 2004. Applicant respectfully submits that the amendment and the following remarks are fully responsive to the official communication.
2. The claims have been amended in light of the official communication. It is submitted that no new matter has been added as a result of the amendment.
3. In paragraph 2 of the Detailed Action, the Examiner again rejected claims 11 to 13 and 15 to 20. These claims have all been deleted.
4. In paragraph 3 of the Detailed Action, the Examiner objected to claim 14 as being a duplicate of claim 4. Claim 14 has been deleted.
5. In paragraph 5 of the Detailed Action, the Examiner has rejected claims 1 to 10 and 14 under 35 U.S.C. 103(a) as being unpatentable over Greenway et al, in view of Gove et al and Anderson et al.
6. Applicant notes, with respect, that Greenway et al is cited for the first time in this office action. As such, it appears that new grounds of objection have been raised. Accordingly, Applicant respectfully submits that the office action should not be final. In any event, Applicant sets out the following arguments and has filed this response with a Request for Continued Examination.
7. Claim 1 has been amended to emphasize the fact that the camera includes a number of substantially identical processing units that are configured to work in parallel and are configured to define a VLIW vector processing assembly.
8. Claim 1 has also been amended to emphasize the fact that the camera includes a reader for reading image processing instructions.
9. In view of the amendments, Applicant respectfully submits that it is not necessary to respond directly to the Examiner's comments forming the basis of the rejection. However, Applicant makes the following remarks in support of the amendments to the claims.
10. It is respectfully submitted that neither Greenway et al nor Gove et al nor Anderson et al discloses a number of substantially identical processing units that are configured to work in parallel and define a VLIW vector processing assembly. In particular, Greenway et al discloses different processing units or "sub-elements" such as a "maximum opacity circuit 144" and a "histogrammer 146" (column 6, lines 20 to 25). Gove et al discloses four parallel processors and a master processor that are connected to a memory via a switch matrix (column 6, lines 25 to 34). Anderson et al simply discloses a "conventional processor device for controlling the operation of camera 110" (column 4, lines 56, 57).
11. In the case of *Hodosh v Block Drug Co. Inc.*, 786 F.2d 1136, 1143 n.5, 229 USPQ 182, 187 n.5 (Fed Cir. 1986) it was held that the following rules should apply to obviousness rejections (from MPEP 2141):

- (A) The claimed invention must be considered as a whole;

- (B) The references must be considered as a whole and must suggest the desirability and thus the obviousness of making the combination;
- (C) The references must be viewed without the benefit of impermissible hindsight vision afforded by the claimed invention; and
- (D) Reasonable expectation of success is the standard with which obviousness is determined.

12. It is respectfully submitted that when considering the invention as claimed in the amended claims as a whole, there is provided a hand-held digital camera that comprises an image sensor, a reader, the substantially identical processing units that are configured to define a VLIW vector processing assembly, a crossbar switch and a printer.

13. Significantly, neither of the citations discloses a printer that is hand-held. It follows that no combination of the citations can provide a camera that incorporates a printer. Furthermore, since, as discussed above, neither of the citations discloses a number of substantially identical processing units that are configured to work in parallel and are configured to define a VLIW vector processing assembly no combination of the citations can provide a camera that incorporates such a processing arrangement.

14. Applicant submits that it follows that the references do not suggest the desirability of combining the references since such a combination would not achieve the invention as claimed in claim 1, as amended.

15. In view of the above paragraphs, Applicant respectfully submits that the invention as claimed in claim 1, as amended is not obvious in light of the patents cited by the Examiner.

16. Claim 2, as amended, is dependent on claim 1. New claims 21 to 25 are also dependent on claim 1. Accordingly, the above remarks are relevant to the remaining claims.

It is respectfully submitted that all of the Examiner's objections have been successfully traversed. Accordingly, it is submitted that the application is now in condition for allowance. Reconsideration and allowance of the application are courteously solicited.

Very respectfully,

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